

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

FLAME S.A.

Plaintiff,

V.

m/v LYNX, her engines, freights, apparel,  
appurtenances, tackle, etc., in rem

Defendant.

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**C.A. No. 10-cv-00278-RC**  
**IN ADMIRALTY, Rule E**

**NOTICE OF EMERGENCY MOTION TO VACATE**

PLEASE TAKE NOTICE that upon the attached Memorandum of Law in Support and the Declarations of Ioannis Vekris and Evangelos Hahos, specially appearing non-party claimant, CAMELA NAVIGATION INC., will move this Court, before the Honorable Ron Clark, in Courtroom \_\_, United States District Court, Eastern District of Texas, United States Courthouse, 300 Willow Street, Suite 221, Beaumont, Texas 77701, at a date and time to be determined by the Court, for an Order: (i) vacating the Rule C Order granting a warrant of arrest of the M/T LYNX; (ii) dismissing the complaint in its entirety; (iii) granting CAMELA NAVIGATION its costs and expenses, including reasonable attorneys' fees, in this proceeding; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: Oyster Bay, New York  
May 16, 2010

Respectfully submitted,

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CAMELA NAVIGATION INC.

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2010, a true and correct copy of the foregoing has been served on all counsel of record through electronic transmission, the Case Management/Electronic Case File (CM/ECF) System for the USDC, EDTx which will send notification of such filing(s) to the following:

Michael K. Eaves, Esq.  
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I hereby certify that on May 16, 2010 I have provided a true and correct copy of the foregoing by electronic mail and by depositing same with the U.S. Postal Service, properly addressed, certified mail, on this 16th day of May, 2010 to the following non-registered participant:

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